

1 ROD M. FLIEGEL, Bar No. 168289
2 rfliegel@littler.com
3 ALISON S. HIGHTOWER, Bar No.
4 ahightower@littler.com 112429
5 AMANDA N. FU, Bar No. 254287
6 afu@littler.com
7 LITTLER MENDELSON, P.C.
8 650 California Street, 20th Floor
9 San Francisco, California 94108.2693
10 Telephone: 415.433.1940
11 Facsimile: 415.399.8490

12 Attorneys for Defendant
13 U.S. SECURITY ASSOCIATES, INC.

14 UNITED STATES DISTRICT COURT
15 NORTHERN DISTRICT OF CALIFORNIA

16 ROBERT STONE, on behalf of himself and
17 all others similarly situated,

18 Plaintiff,

19 v.

20 U.S. SECURITY ASSOCIATES, INC., a
21 Delaware corporation, and Does 1 through 10,
22 Defendants.

Case No. 3:15-CV-00235-JST

23 **STIPULATION AND ~~PROPOSED~~**
24 **ORDER POSTPONING CASE**
25 **MANAGEMENT CONFERENCE**

26 Complaint Filed: January 16, 2015

1. **IT IS HEREBY STIPULATED AND REQUESTED** by and between the parties who have to date appeared in this action, through their counsel of record, Peter R. Dion-Kindem of The Dion-Kindem Law Firm; Lonnie C. Blanchard, III of The Blanchard Law Group, APC; and Jeffrey D. Holmes of Holmes Law Group, APC, attorneys for Plaintiff ROBERT STONE (“Plaintiff”); and Rod M. Fliegel, Alison S. Hightower and Amanda N. Fu of Littler Mendelson, P.C., attorneys for Defendant U.S. SECURITY ASSOCIATES, INC. (“Defendant”), based upon the following recitals:

2. WHEREAS Defendant filed a motion to transfer venue to the Northern District of Georgia originally set to be heard on April 9, 2015 (Doc. 17);

3. WHEREAS on March 26, 2015, this Court granted the parties' joint request to extend the parties' deadlines under Federal Rule of Civil Procedure Rule 26 and 26(f) pending resolution of the motion to transfer venue, assuming that motion is denied (Doc. 20);

4. WHEREAS on March 31, 2015, this Court vacated the April 9, 2015 hearing date on Defendant's pending motion to transfer venue (Doc. 22);

5. WHEREAS, the initial Case Management Conference in this action is currently set for April 29, 2015 and a Joint Case Management Statement is due to be filed on April 15, 2015;

6. WHEREAS, a transfer of venue likely will result in additional or different case management schedules and requirements, and thus a modest delay on these obligations will further efficient and effective case management and thus serve the interests of economy for the Court and all Parties;

STIPULATION

Pursuant to this Court's Standing Order and Civil Rule 16-2(e), so as to promote efficient and effective case management and thus serve the interests of economy for the Court and all Parties, the Parties hereby stipulate, agree and respectfully request:

1. That the Case Management Conference, currently set for April 29, 2015, is continued until _____, 2015, or _____ days after this Court's service of an order on Defendant's Motion To Transfer Venue, assuming that motion is denied;

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2. The current April 15, 2015 deadline for the parties to file their Joint Case Management Conference Statement is extended until 14 days prior to the new date for this Case Management Conference;

3. In the event the Court grants Defendant's pending Motion to Transfer Venue, these deadlines will be vacated and will be set by the transferee district.

IT IS SO STIPULATED.

Dated: April 13, 2015

/s/ Peter R. Dion-Kindem
PETER R. DION-KINDEM
THE DION-KINDEM LAW FIRM
Attorneys for Plaintiff
ROBERT STONE

Dated: April 13, 2015

/s/ Alison S. Hightower
 ROD M. FLIEGEL
 ALISON S. HIGHTOWER
 LITTLER MENDELSON, P.C.
 Attorneys for Defendant
 U.S. SECURITY ASSOCIATES, INC.

ORDER

PURSUANT TO STIPULATION, THE COURT HEREBY ORDERS:

1. The Case Management Conference, currently set for April 29, 2015, is continued until June 24, 2015, ~~or _____ days after this Court's service of an order on Defendant's Motion to Transfer Venue, assuming that motion is denied;~~

2. The current April 15, 2015 deadline for the parties to file their Joint Case Management Conference Statement is extended until 14 days prior to the new date for this Case Management Conference; and

3. In the event the Court grants Defendant's pending Motion to Transfer Venue, these deadlines will be vacated and will be set by the transferee district.

Dated: April 15, 2015



HON. JON S. TIGAO
U.S. DISTRICT COURT JUDGE

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